

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Reading)**

In Re: : Chapter 13  
John W. Dunn : Case No. 14-13690-REF  
Debtor,  
-----  
NewRez LLC d/b/a :  
Shellpoint Mortgage Servicing :  
Movant, : Hearing: March 14, 2019  
v. : Courtroom # 1  
John W. Dunn :  
Debtor,  
And  
Scott Waterman, Esquire : 11 U.S.C. §362(d)  
Trustee,  
Respondent.

**STIPULATION RESOLVING MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY**

THIS matter being opened to the Court by Brian E. Caine, Esquire, of the law office of Parker McCay P.A., attorney for the secured creditor, NewRez LLC d/b/a Shellpoint Mortgage Servicing, (hereinafter “Movant”), upon a Motion for Relief from the Automatic Stay as to Real Property, more commonly known as 1532 N. 11th St., Reading PA 19604; and Shawn J. Lau, Esquire appearing on behalf of the Debtor, and it appearing that the parties have amicably resolved their differences and for good cause shown;

1. As of March 13, 2019, the post-petition arrears is \$7,273.94.
  2. The debtor agrees to reimburse the Movant \$831.00 for its attorney fees and costs for the Motion.

3. The debtor will cure the post-petition arrears by making the following payments:

- a. \$6,378.47 by March 22, 2019;
- b. \$895.47 by March 27, 2019.

4. The debtor will reimburse Movant for its attorney fees and costs by adding \$207.75 to the regular monthly payments each due April 1, 2019 through and including July 1, 2019.

5. The debtor will resume regular monthly payment starting with the August 1, 2019 payment, and continuing each month thereafter for the duration of this Chapter 13 proceeding, Debtor shall remit payments directly to Movant as same come due.

6. If the debtor fails to make any of the payments stated herein within fifteen (15) days of its due date, then counsel for the Movant may file a Certification of Default with the Court and the Court shall enter an Order granting Movant relief from the automatic stay.

*The undersigned hereby consent to the form and entry of the within Stipulation.*

/s/Brian E. Caine  
Brian E. Caine, Esquire  
Attorney for Movant

/s/Shawn J. Lau  
Shawn J. Lau, Esquire  
Attorney for Debtor  
  
Concurrence of the Chapter 13 Trustee

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2019, it is hereby ORDERED  
that the foregoing Stipulation is approved, shall be, and is made and Order of this Court.

---

Chief Judge Richard E. Fehling  
U.S. Bankruptcy Court  
Eastern District of Pennsylvania